

I am writing in support of the Commission's efforts to combat the unauthorized changing of an individual's telephone service, known as "slamming." In particular, I was overjoyed to see that the Commission seeks to place additional requirements on third-party verifiers to insure that the telephone subscriber has in fact agreed to the change in coverage. The Commission would place a significant barrier in front of telephone companies that do "slam" consumer by requiring third-party verifiers to make a record of the date on which the change was authorized and to ask the subscriber if there are additional question before the change was made. More importantly, however, I believe that the Commission's adoption of these requirements would offer the consumer and legitimate telephone companies the much-needed protection that they deserve.

Legitimate telephone companies should be provided the means with which they can distinguish themselves from their "slamming" counterparts. I was shocked to read that some phone companies would exploit the fact that a date was not articulated in a former verification to protect themselves in subsequent enforcement proceedings. Those companies that do engage in "slamming" should not be able to deploy the same deceptive tactics they have honed in their marketing pitches to mislead others in an enforcement proceeding. At the same time, however, I would think that legitimate telephone companies are often times accused of similar practices and have little in the way to prove otherwise. The Commission's proposed requirement that third-party verifiers state in the verification call the date on which the change in service was approved would provide the legitimate telephone companies some of the certainty it needs to protect itself from consumer accusations.

Meanwhile, it is well known that that the few telephone companies that do engage in the practice of "slamming" have a tendency to prey on the elderly and others through methods of confusion. I agree that requiring the third-party verifier to ask the consumer if she has any further questions and state that her service will be change at the end of the call will lessen the consumer's confusion. Obviously, it will not put an end to it. Telephone companies that do slam often have the consumer so perplexed and under such an enormous amount of pressure that she is simply willing to say anything to end the conversation, even with the third party verifier. Nevertheless, it would offer much in the way of providing the consumer with some clarification before her service is changed.

I appreciate the opportunity to comment on the Commission's proposed rule and look forward to the Commission's final decision.

Respectfully,
Patrick Ellis